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IHSA-82-033
31 AUG 1982

MEMORANDUM FOR: Executive Officer, DDA

FROM: [redacted] STAT
Information Handling Systems Architect

SUBJECT: Legislative Programs for the First Session of the Ninety-Eighth Congress

1. The Department of Commerce has failed to act on the seemingly universal recommendation that compliance with the Federal Information Processing Standards (FIPS) be delegated to the Departments and Agencies of the government. The present process of preparing elaborate justification for requests for waivers to the DOC is extremely wasteful, particularly in light of the fact that there are no known denials of such requests made by members of the Defense community. Since the DOC appears unwilling to make such a delegation, perhaps it should be done by Congress.

2. This recommendation for delegation of authority should not be interpreted as a depreciation of the value of the FIPS to the government. Their development by the Institute of Computer Science and Technology (ICST) is an important and most valuable function of the DOC. No other component of government has dedicated or is likely to dedicate the resources necessary to develop such a family of standards. Their chief value lies in providing baseline documents for developing the needed standards in particular acquisitions, rather than in providing procurement absolutes. It is hard to envision any major procurement in which a full set of standards can or should be applied as written. The technology of information handling systems is frequently advancing at a far more rapid pace than standards can be drafted and vetted through the government, and there are unique aspects in almost all system procurements. The consequences of these factors have to be accommodated through modification of the standards, or sometimes use of completely new requirements. Thus, the FIPS are really baseline documents.

3. The process of FIPS development also has a substantial additional payoff to the government in pressuring the hardware and systems software suppliers of the industry towards badly needed standardization. Standards often benefit all acquisition activities through creation of a more competitive environment.

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4. It should be recognized that there are basically two types of standards developed by ICST. The foregoing comments referred principally to those standards having to do with hardware and software packages. These received early emphasis in the FIPS development program, and almost 100 have been prepared in this area. With this aspect now well covered, the ICST has shifted its emphasis to "guidelines" and procedural documents, having to do with system development and management. These documents are helpful as reference material to be applied on a selective basis. As mandatory documents, they are a problem. Most government agencies now have their own procedural and management documents, tailored to their unique needs. The FIPS in this area are generally in conflict, in some degree, with Agency documents. While these may be new and useful elements in the procedural FIPS, they are generally not acceptable for unmodified standardization. Thus, while there has been great value in the early FIPS, increasingly, the ones now being produced are not directly applicable as standards. As a consequence, we seem to be on the verge of a sizable, government-wide exceptions process if the delegation is not granted.

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cc: D/ODP
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